

## ecology and environment, inc.

223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415

International Specialists in the Environmental Sciences



July 19, 1984

Mr. Lloyd Dekeyser Kitzinger Cooperage Corporation 2529 Norwich Street St. Francis, WI 53207

Site Name: Kitzinger Cooperage Corporation

TDD No:

R5-8303-1F

Dear Mr. DeKeyser:

This letter is in response to your recent inquiry requesting additional information concerning our firm. The firm of Ecology and Environment, Inc. has been retained by the U.S. Environmental Protection Agency under contract 68-01-6692 for the purpose of evaluating candidate sites for the National Priorities List under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), better known as Superfund.

Information supplied to the U.S. EPA through CERCLA notifications as required by Section 103(c) of CERCLA has identified the property in question as a possible candidate for the National Priority List. Aspart of our evaluation, the U.S. EPA has asked us to perform an onsite inspection of the property in question. This is the reason for my request to visit your facility on July 31, 1984.

I have attached a copy of the Letter of Introduction provided by the U.S. EPA for Ecology and Environment employees engaged in field investigation work, which outlines the statutory basis for such inspections. So you have a better understanding of the questions we need to ask, I have also attached a copy of the site inspection form.

If you have any further information or if a change in plans is necessary, please do not hesitate to call me.

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Sincerely,

Eileen Marie Black

EMB:3X

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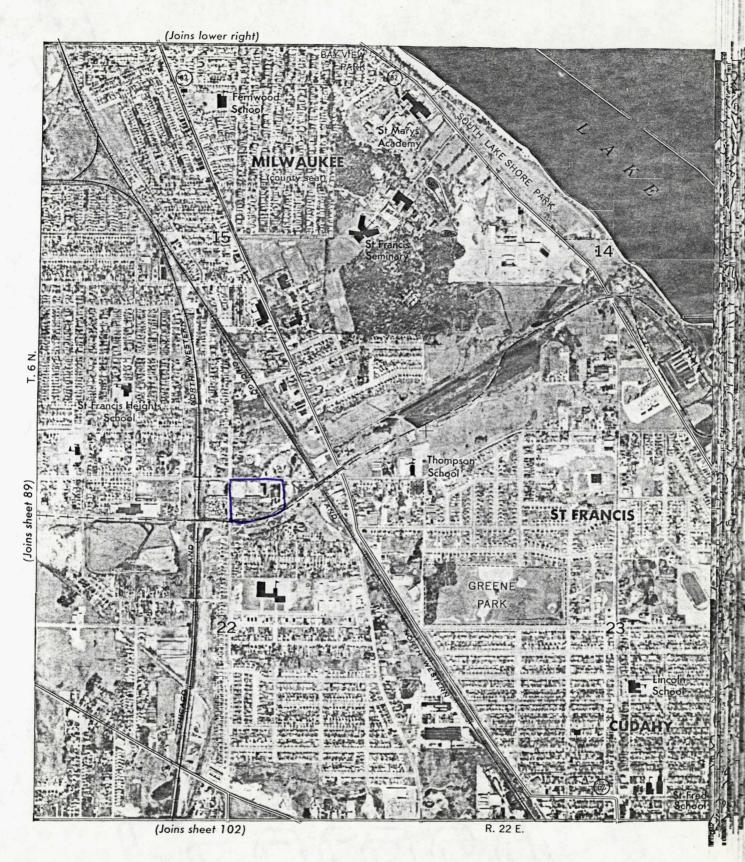
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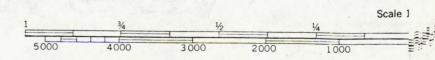
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Establishments grimarily engaged in marketing industriel supplies

such as ... ; and recorditioned barrels

and drums





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P.O. Box 12436 Milwaukee, WI 53212

February 9, 1984

File Ref: 4430

Mr. Lloyd DeKeyser Kitzinger Cooperage Corporation 2529 East Norwich Street Milwaukee, WI 53207

Dear Mr. DeKeyser:

RE: Notice of Violation

On July 6, 1983, your facility located at 2529 East Norwich Street, Milwaukee, Wisconsin, EPA ID No. WID023402639 was inspected by the Department. As a result of this inspection, your facility was found to be in non-compliance with Chapter NR 181, Wisconsin Administrative Code. In a letter dated August 12, 1983, the specific areas of non-compliance were listed by the Department.

Your facility was required to correct the following areas of non-compliance:

- A) Lack of written contingency plan for all hazardous wastes, (s. NR 181.21(5)(a)5).
- B) Lack of personnel training records, (s. NR 181.21(5)(a)5).
- C) Lack of personnel training in contingency plan implementation and an annual review, (s. NR 181.21(5)(a)5).

The Department has not received all the required corrections that were identified. Therefore, your facility is in violation with the above referenced Department letter dated August 12, 1983.

Failure to correct the above areas of violation will result in further enforcement by the Department. You should be aware that ss. 144.74, State Statutes provides for penalties of up to \$25,000 for each day of violation. The above-cited corrections must be submitted to this office within 30 days from the date you receive this letter.

You should be informed that the Department may perform additional inspections at this facility in the future to insure compliance with Chapter NR 181, Wisconsin Administrative Code.

If you should have any questions, please contact Victor Pappas of my staff at (414) 562-9640.

Sincerely,

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Arthur H. Glor, Jr. Chief, Solid Waste Management

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		File Reference	e: 4430
DESIGNATED USE: [ ] Inspection D [ ] Non/Small Ge [ ] TSD Non-Act	Form Supplement enerator Follow-up . ivity Follow-up		
A) GENERAL INFORMATION			
EPA ID # WTD 023402639 (if applicable)	Di	strict. Southeas	24
FACILITY NAME: Kitzinger	Cooperage Co.	rp	
FACILITY LOCATION: 2529	East Norwich.	Street	
	CEE WI. 53		
그 요즘 그는 이 경기를 내려왔다면 하는 생각 경기 없었다면 하는			no
FACILITY CONTACT PERSON: Lloy	d De Keysei	TITLE: MAN	VAGER
TELEPHONE NUMBER: (414) 483	-8800		
DNR INSPECTOR: Victor C.	Pappa 5		
B) CONTACT TYPE			
Telephone Only [	] Personal Meeti	ng [ ]	
Field Inspection		07106183	
		0.70070	
DNR Master File Indicates Facili	ty Type As:		,
C) WASTE STREAM INFORMATION			
POTEN	TIAL HAZARDOUS ENTS/CHARACTERISTICS	GENERATOR RATE	EPA WASTE CODE
HAZARDOUS WASTE SOLID-NOS BURNED BARREC WASTE	TOXIC HEAVY METALS	1 4000 gallons (2 Luggers) Les month	D007 D008
HAZANDOUS WASTE Liquid - NOS	TOXIC HEAVY METALS	~ 10,000 gallons per year	D008
PAINT Filters	ignitable	n 30 per day	D001

DAZAKDOUS WASTE ACTIVITY FORM

11

Attach Waste Profile or Analysis for each Waste Stream or indicate how facility has complied with NR 181.22, Hazardous Waste Determination, for each Waste Stream.

3)

PAINT SludgES

Indicate any on-site Treatment, Storage, or Disposal methods in use for the above Waste Streams: Kitzinger treats residual wastes which may sometimes be hazardous from empty Containers. Because the hazardous waste supposedly meets the Definition in ND181.135, It appears to be exempted here.

If the waste is shipped off-site, indicate how it is transported, the transporter names, and whether licensed:

WASTE MANAGEMENT, INC. > BOTH AAA Environmental Ind. > Licensed

Where is the waste being transported to:

WASTE MANAGEMENT - Illinois Controlled WASTE - GERMANTOWN, WI.

## E) COMPLIANCE INFORMATION

No Contingency Plan; Lack of Personnel Training RECORDS

Additional Comments:

IT APPEARS THAT The Hazardous WASTE TAKEN IN by Kitzinger would be exempted from treatment requirements if they comply with s.NR181.135. ATTACHED are Some Policy Form

ATTACHED are Some Policy Form LETTERS DEVELOPED By Kitzinger for the purposes of informing their Customers of their requirement to take "empty" barrels.

Kitzinger also generates paint films that appear to be ignitable and some paint sudge which is disposed of in the barrel incine afor. If hazardous, this waste would not be exempted by 181.135, and a treatment license would be recessory.

Facility Classification Based on District Ver	rificat:
Signature: Victor C. Pappas	Date: 7-6-83

## STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

See reverse side, Copy 6, for instructions.

HAZARDOUS WASTE MANIFEST FORM Wisconsin Statutes 144 FORM 4400-66 9-80

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FOR DNR USE ONLY

A 21257

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7. NUMBER & TYPE OF	8. GALLONS		WASTE NAME		10. US DOT HAZARD CLASS	11. US DOT IDENTIFICATION NUMBER	12. PHYSICAL STATE (Enter number in box)	13. US EPA WAS'TE CODE	14. SHIPPING WEIGHT (Pounds)
d /weer boxes	4000	Hozard	ous Was	te Solid	orme	NA 9189	1. Solid 3. Mixture 7	D007	128000_
Q /Wyer cone				Parrel Waste			1. Solid 3. Mixture 2. Liquid	,	
		7700	arne				1. Solid 3. Mixture 2. Liquid	di nell'importa	
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I hereby certify that the abin proper condition for train			uffne) has (have) b	been accepted b the facility	I hereby certify the received and acception 38. AUTHORIZE		naterials and indicated quar	ntity(ies) has (h.	ave) been  40. Date Accepte  M / D / Y
24 AUTHORYZED SON	ATURE - 2	NAME (Prind	) [26.	Date Accepted			naterials and indicated quar	ntity(ies) has (h.	
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designated as Hazardous W.  27. 2nd, TRANSPORTER	aste racinty.		28. EPA IDEN NO.		43. AUTHORIZE	DSIGNATURE	44. NAME (Print)		M / D / Y
29 AUTHORIZED SIGN	NATURE 3	0. NAME (Print)		. Date Accepted	46. MAIL TO: Department of Solutions of Solutions	f Natural Resources id Waste Managemen	47. Emergency 24 Hour In Wisconsin Outside Wisconsin	(608-266-32) (800-424-88)	126

Box 8094

Madison, Wisconsin 53707